

1 C.A. (Cathie) Olendorff, Esq.
 Nevada Bar #3554
 2 5225 W. Post Road
 Las Vegas, NV 89118
 3 Telephone: (702) 873-8012
 Facsimile: (702) 365-7864
 4 legal@yestrans.com

5 *Counsel for Defendants*
 Nevada Yellow Cab Corporation
 6 Nevada Checker Cab Corporation
 Nevada Star Cab Corporation

7
 8 **UNITED STATES DISTRICT COURT**
 9 **DISTRICT OF NEVADA**

10 THEODORE TRAPP, on his own behalf and
 on behalf of all others similarly situated.

11 Plaintiff,

12 vs.

13 BIG POPPA'S, LLC, a Nevada limited
 14 liability company d/b/a BADDA BING
 MEN'S CLUB; SKY TOP VENDING, INC.,
 15 a Nevada corporation d/b/a CAN CAN
 ROOM; LA FUENTE, INC., a Nevada
 16 corporation d/b/a CHEETAH'S; C.P. FOOD
 AND BEVERAGE, INC., a Nevada
 17 corporation d/b/a CLUB PARADISE; DEJA
 VU SHOWGIRLS OF LAS VEGAS, LLC, a
 18 Nevada limited liability company d/b/a DEJA
 VU SHOWGIRLS; PALOMINO CLUB,
 19 INC., a Nevada corporation d/b/a/
 PALOMINO CLUB; SHAC, LLC, a Nevada
 20 limited liability company d/b/a SAPPHIRE;
 K-KEL, INC., a Nevada corporation d/b/a
 21 SPEARMINT RHINO; D.2801
 WESTWOOD, INC., a Nevada corporation
 22 d/b/a TREASURES; LITTLE DARLINGS
 OF LAS VEGAS, LLC, a Nevada limited
 23 liability company d/b/a LITTLE DARLINGS;
 O.G. ELIADES, A.D., LLC, a Nevada limited
 24 liability company d/b/a OLYMPIC
 GARDENS; LAS VEGAS
 25 ENTERTAINMENT, LLC, a Nevada limited
 liability company d/b/a LARRY FLYNT'S
 26 HUSTLER CLUB; MICHAEL A.
 SALTMAN d/b/a MINXX; RICK'S LAS
 27 VEGAS; FRIAS MANAGEMENT, LLC, a
 Nevada limited liability company d/b/a ACE
 28 CAB COMPANY and A-NORTH LAS

CASE NO. 2:09-cv-00995-LDB-GWF

STIPULATION AND ORDER TO
 EXTEND DATE FOR DEFENDANT'S
 NEVADA YELLOW CAB
 CORPORATION, NEVADA CHECKER
 CAB CORPORATION AND NEVADA
 STAR CAB CORPORATION TO
 RESPOND TO PLAINTIFF'S CLASS
 ACTION COMPLAINT

1 VEGAS CAB; WESTERN CAB)
2 COMPANY, a Nevada corporation d/b/a)
3 WESTERN CAB COMPANY and)
4 WESTERN LIMOUSINE; NEVADA)
5 CHECKER CAB CORPORATION, a Nevada)
6 corporation d/b/a NEVADA CHECKER CAB)
7 COMPANY; NEVADA STAR CAB)
8 CORPORATION, a Nevada corporation d/b/a)
9 STAR CAB COMPANY; NEVADA)
10 YELLOW CAB CORPORATION, a Nevada)
11 corporation d/b/a YELLOW CAB)
12 COMPANY; LUCKY CAB COMPANY OF)
13 NEVADA, a Nevada corporation d/b/a)
14 LUCKY TRANS; SUN CAB, INC., a Nevada)
15 corporation d/b/a NELLIS CAB COMPANY;)
16 CLS NEVADA, LLC, a Nevada limited)
17 liability company d/b/a CLS)
18 TRANSPORTATION LAS VEGAS; ON)
19 DEMAND SEDAN SERVICES, LLC, a)
20 Nevada limited liability company d/b/a ODS)
21 LIMOUSINE and ODS CHAUFFEURED)
22 TRANSPORTATION; BLS LIMOUSINE)
23 SERVICE OF LAS VEGAS INC., a Nevada)
24 corporation d/b/a BLS LIMOUSINE)
25 SERVICE OF LAS VEGAS; DESERT CAB,)
26 INC., a Nevada corporation d/b/a DESERT)
27 CAB COMPANY and ODYSSEY)
28 LIMOUSINE; BELL TRANS, a Nevada)
corporation d/b/a BELLS TRANS; TONY)
CHONG, an individual; and DOE)
EMPLOYEES 1-1000;)
Defendants.)

19 Plaintiff Theodore Trapp (“Plaintiff” or “Trapp”) and Defendants Nevada Yellow Cab
20 Corporation, Nevada Checker Cab Corporation and Nevada Star Cab Corporation (collectively
21 known as “YCS”) propose the following Stipulation and Proposed Order enlarging the time for YCS
22 to answer or otherwise respond to the Complaint. In support, the Parties state as follows:

23 **WHEREAS**, on June 2, 2009, Plaintiff filed a four-count putative class action Complaint
24 (“Complaint”) against Defendants alleging violations of Nevada’s Racketeering Statute and
25 Consumer Fraud Statute;

26 **WHEREAS**, based upon the multitude of issues contained in the Complaint, YCS seeks
27 additional time to answer or otherwise plead. YCS requests an extension of time to respond to
28

1 Plaintiff's Complaint up to and including August 24, 2009;

2 **WHEREAS**, counsel for YCS has conferred with Plaintiff's counsel and is authorized to
3 state that Plaintiff has no objection to the extension of time requested herein.

4 **NOW, THEREFORE**, the parties hereby, **STIPULATE and AGREE** as follows:

5 YCS' last day to answer or otherwise plead to Plaintiff's Complaint shall be August 24,
6 2009.

7 Dated this 5th day of August, 2009.

8
9 KUMMER KAEMPFER BONNER
10 RENSHAW & FERRARIO
11

12 /s/ _____
13 James E. Smyth, II, Esq.
14 3800 Howard Hughes Parkway, 7th Fl.
15 Las Vegas, NV 89169

16 Jay Edelson, Esq.
17 Kamber Edelson, LLC
18 350 North LaSalle Street, Suite 1300
19 Chicago, IL 60654
20 Attorneys for Plaintiffs

21 /s/ _____
22 C.A. (Cathie) Olendorff, Esq.
23 5225 W. Post Road
24 Las Vegas, NV 89118

25 Attorney for Defendants,
26 Nevada Yellow Cab Corporation
27 Nevada Checker Cab Corporation
28 Nevada Star Cab Corporation

18 **IT IS SO ORDERED:**

19
20 DATED: _____, 2009
21

22 _____
23 PEGGY A. LEEN
24 UNITED STATES MAGISTRATE JUDGE
25
26
27
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